

Marketing Policy and Procedure

Policy

1. This policy supports the following:
 - the Compliance Requirements about Marketing and Advertising, Guarantees and Inducements and Schedule 2— Nationally Recognised Training Logo Conditions of Use Policy in the National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025 (“Compliance Requirements”);
 - Standard 2.1 of the National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025 (“Outcome Standards”); and
 - Standards 1, 2 and 7.1 of ESOS National Code 2018.
2. The College ensures its marketing and advertising of the Australian Qualifications Framework (AQF) and VET qualifications to prospective clients and learners is ethical, accurate and consistent with its scope of registration.
3. The College ensures any advertisements or marketing materials published or disseminated by the college, a third party or an expert engaged by the college:
 - a. include the college’s registration code or a link to the part of the National Register where the college’s registration code is located;
 - b. where the advertisements or marketing materials refer to the college’s services – accurately represent those services, including by distinguishing the types of training and assessment that will result in the issuance of AQF certification documentation from any other training and assessment delivered by the college;
 - c. include accurate information regarding any financial support arrangements available in respect of the services referred to in the advertisements or marketing materials; and
 - d. do not refer to or imply a connection with another person unless the consent of that person has been obtained.
4. Where the advertisements or marketing materials refer to a training product, the College ensures the advertisements or marketing materials:
 - a. include the code and title of the training product as published on the National Register;
 - b. accurately represent the training products on the college’s scope of registration;
 - c. only refer to a training product that is no longer current while it remains on the college’s scope of registration and new enrolments are permitted; and
 - d. only represent that completion of a training product will lead to a licensed or regulated outcome where this has been confirmed by the relevant industry regulator.
5. Where advertisements or marketing materials refer to services that the college has engaged an expert or third party to deliver – the college ensures the advertisements or marketing materials identify which services will be delivered by the expert or third party, including where an expert or third party is recruiting prospective VET students on behalf of the college.
6. The College must not make any verbal or written guarantees that a VET student:
 - a. will successfully complete a training product;
 - b. can complete a training product in a manner which is inconsistent with any of the relevant compliance requirements in force from time to time; or
 - c. will obtain a particular employment outcome, where obtaining such an employment outcome is not within the college’s control.
7. The College, as a provider of courses for international / overseas students registered on CRICOS, must:

- a. ensure that the marketing and promotion of its courses and education services in connection with the recruitment of overseas students or intending overseas students, including through an education agent (in accordance with Standard 4 of the National Code 2018), is not false or misleading, and is consistent with Australian Consumer Law.
 - b. in seeking to enter into written agreements with overseas students or intending overseas students, not provide any false or misleading information on:
 - i. its association with any other persons or organisations the registered provider has arrangements with for the delivery of the course in which the student intends to enrol or may apply to enrol
 - ii. any work-based training a student is required to undertake as part of the course
 - iii. prerequisites—including English language proficiency—for entry to the course
 - iv. any other information relevant to the registered provider, its courses or outcomes associated with those courses.
 - c. not:
 - i. claim to commit to secure for, or on the student or intending student's behalf, a migration outcome from undertaking any course offered by the registered provider
 - ii. guarantee a successful education assessment outcome for the student or intending student.
 - d. include its CRICOS registered name and registration number in any written or online material that it disseminates or makes publicly available for the purposes of:
 - i. providing or offering to provide a course to an overseas student
 - ii. inviting a student to undertake or apply for a course, or
 - iii. indicating it is able or willing to provide a course to overseas students.
 - e. not actively recruit a student where this conflicts with its obligations under Standard 7 of the National Code 2018 (Overseas student transfers).
8. The College uses the Nationally Recognised Training (NRT) logo only in accordance with its conditions of use as permitted where there is a direct relationship to an AQF qualification and/or unit of competency as specified within training packages or VET accredited courses. Please refer to Schedule 2— Nationally Recognised Training Logo Conditions of Use Policy in the Compliance Standards (Requirements).
9. The College ensures the marketing of its education and training services is undertaken in a professional manner and maintains the integrity and reputation of the industry and registered providers.
10. The College must:
- a. clearly identify the College's legal name, and CRICOS number in written marketing materials for international students, including electronic form.

This means that all written and electronic material that is used for marketing and recruitment of overseas students lists the College's legal entity and CRICOS code. The College's trading name is not required, but may also be included. Examples of marketing material used for recruitment purposes could include:

 - information about courses for overseas students including course outlines/handbook if used to market courses and recruit students;
 - the homepage of the College's website and pages relating to international student services;
 - information about living in Australia if it is used as a tool to market to and recruit students and if it has been produced for or by the College for the purpose of marketing to and recruiting students;
 - an advertisement for courses for international students in an Australian or foreign newspaper;

- materials that promote and advertise courses with the College (including cards which may be considered more advertisements than conventional business cards);
 - a letterhead, signature block or footer used in letters making offers to students, promoting courses or for other marketing purposes; and
 - emails that are sent to students offering enrolment or informing students of courses.
- b. not give false or misleading information or advice in relation to:
- claims of association between providers
 - the employment outcomes associated with a course
 - automatic acceptance into another course
 - possible migration outcomes, or
 - any other claims relating to the registered provider, its course or outcomes associated with the course.
11. The college is to ensure that:
- a. all information provided to VET students by the college or any third parties is clear, accurate and current.
- b. it identifies which information VET students require prior to their enrolment and that information is communicated to VET students prior to their enrolment.
- c. the following information is easily accessible by VET students:
- the training product code and title, duration, modes of delivery, training delivery location, training commencement dates, scheduling, any requirements to commence or complete the training product including assessment requirements, whether any licencing or occupational licence requirements apply, and details of any third party arrangements that apply to the delivery of the training;
 - the training support services and wellbeing support services that are available to the VET student, and how the student can access those services;
 - all fees, costs and charges associated with the provision of the training product which VET students may incur, including payment terms and conditions, any applicable refund policies and the availability of any relevant government training entitlements and subsidies; and
 - any obligations or liabilities which may be imposed on VET students undertaking the training product, including any obligations requiring VET students to acquire any materials, equipment or IT, any costs and processes associated with withdrawing from training, any costs and processes associated with obtaining a Student Identifier, and any requirements for VET students to undertake work placements.
- d. the college informs VET students, as soon as practicable, of any changes to training products or the college's operations that may affect VET students, including any changes relating to the transition of superseded, deleted, or expired training products.
12. Prior to accepting an overseas student or intending overseas student for enrolment in a course, the College must make comprehensive, current and plain English information available to the overseas student or intending overseas student on:
- a. the requirements for an overseas student's acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required, and course credit if applicable
- b. the CRICOS course code, course content, modes of study for the course including compulsory online and/or work-based training, placements, other community-based learning and collaborative research training arrangements, and assessment methods
- c. course duration and holiday breaks
- d. the course qualification, award or other outcomes
- e. campus locations and facilities, equipment and learning resources available to students

- f. the details of any arrangements with another provider, person or business who will provide the course or part of the course if applicable. The College does not have any arrangements with another provider in providing its courses.
 - g. indicative tuition and non-tuition fees, including advice on the potential for changes to fees over the duration of a course, and the College's cancellation and refund policies
 - h. the grounds on which the overseas student's enrolment may be deferred, suspended or cancelled
 - i. the ESOS framework, including official Australian Government material or links to this material online
 - j. accommodation options and indicative costs of living in Australia.
13. The College will provide learners with information prior to commencement of services including any third party arrangements affecting the delivery of training and/or assessment if applicable.
14. The College will provide or make readily available information to the learner that outlines the services the College will provide the learner, along with the rights and obligations of the learner and the College. This information is contained in the College' marketing materials, Letter of Offer and/ or Written Agreement.
15. The College will ensure that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.
16. The College will be responsible for ensuring transparent and accurate information about College's services and performance is accessible to prospective and current learners and clients of the College, regardless of any arrangements to have this information distributed on behalf of the College.
17. The College will ensure third party arrangements are documented and transparent to facilitate the Regulator's knowledge that such arrangements exist.
18. The College will ensure consent has been gained from another person or organisation for marketing material such as student testimonials or photos.
19. The College ensures its staff and clients are informed of any changes to legislative and regulatory requirements that affect the services delivered.
20. This policy applies to the College's staff and third parties that provide services for student recruitment on behalf of the College / education agents.
21. The CEO is responsible for the implementation of the policy and procedures and to ensure that staff and education agents are aware of its application and implement its requirements.

Procedure

1. The Chief Executive Officer (CEO) ensures that:
 - a. the College markets courses within the Scope of Registration with integrity, accuracy and professionalism, avoiding vague and ambiguous statements. No false or misleading comparisons are to be drawn with any other provider or course.
 - b. the College does not state or imply that courses other than those within the Scope of Registration are recognised by the registering authority.
 - c. the College recruits students at all times in an ethical and responsible manner consistent with the requirements of courses.
 - d. application and selection processes are explicit and defensible and equity and access principles are observed.
2. The Marketing materials will advise prospective students of comprehensive information including but not limited to:
 - its Scope of Registration;
 - application processes and selection criteria;
 - fees involved in undertaking training;
 - fees and refund policy and procedures;

- qualifications to be issued on completion or partial completion of courses;
 - competencies to be achieved during training;
 - assessment procedures including recognition of prior learning;
 - literacy and numeracy requirements;
 - Complaints and Appeals Policy and Procedures;
 - staff responsibilities;
 - facilities and equipment; and
 - student support services
 - the College's and students' obligations
 - other specified information included in this policy.
3. The development of marketing materials including website is overseen and monitored by the Chief Executive Officer/ delegate.
 4. The CEO/ delegate is to sign off all marketing materials. In approving marketing materials including for international students, the CEO is to use the Marketing Information and Practices Checklist.
 5. Approval for marketing materials must be gained prior to release. This approval relates to the accuracy of information contained in any promotion. Release for any material that is related to any joint programs must follow the appropriate third party provider policies and procedures.

Process of Approving Marketing Materials including for International Students

| | STEPS | WHO IS RESPONSIBLE? | COMMENTS |
|----|---|---------------------|--|
| 1. | Review Marketing Information and Practices Checklist | Marketing Officer | Located in the Marketing/ Forms folder |
| 2. | Produce marketing material | Marketing Officer | Material must adhere to Marketing Information and Practices Checklist |
| 3. | Complete and sign Marketing Information and Practices Checklist | Marketing Officer | |
| 4. | Review Marketing Information and Practices Checklist and marketing material for compliance checking | CEO/delegate | |
| 5. | Liaise with Marketing team for amendments | CEO/delegate | |
| 6. | Document amendment communication | CEO/delegate | Print all email correspondence and place in Marketing Material Approval folder |
| 7. | Sign Marketing Information and Practices Checklist and attach the final approved version of the marketing material and send together to Marketing Officer | CEO/delegate | |

| | STEPS | WHO IS RESPONSIBLE? | COMMENTS |
|----|---|---------------------|--|
| 8. | Publish marketing material | Marketing Officer | |
| 9. | File approved Marketing Information and Practices Check list and final approved version of marketing material | Marketing Officer | File approved checklist & Marketing Material in Marketing Material approval folder for auditing purposes |

Timelines

| Responsible | Type of Marketing Material | Estimated Duration |
|-------------|--|--------------------|
| CEO | The CEO/delegate is to approve marketing materials including for international students if it includes the following: course title, CRICOS course code, duration, fees, location, CRICOS provider no. | 2 days |
| CEO | The CEO/delegate is to approve marketing material if it includes academic course contents, such as: course outline, entry requirements, Credit transfer / RPL, application method, content, teaching resources, delivery methods, learning facilities, and assessment. | 4-5 Days |